

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PROMOS TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-788-JJF
)	
FREESCALE SEMICONDUCTOR, INC.,)	
)	
Defendant.)	

PLAINTIFF PROMOS TECHNOLOGIES, INC.'S NOTICE OF 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff ProMOS Technologies, Inc. will take the deposition of defendant Freescale Semiconductor, Inc. ("Freescale"), through its corporate designee(s), before a person authorized to administer an oath at the offices of Ashby & Geddes, 500 Delaware Avenue, 8th Floor, Wilmington DE 19899, commencing at 9:00 a.m. on October 29, 2007, or at such other location as counsel for the parties shall agree, and continuing from day to day until completed. The deposition may be recorded by audio-visual means as well as stenographically.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Freescale shall designate one or more officers, directors or managing agents, or other persons who consent to testify on its behalf concerning the subjects identified in Attachment A, and if more than one person is so named, designate for each person the subject or subjects on which that person will testify.

ASHBY & GEDDES

/s/ *Lauren E. Maguire*

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Dated: October 17, 2007
185057.1

ATTACHMENT A

1. Freescale's policies, practices and channels of sale of the accused products, including the identity of all third parties who purchased any accused product since January 1, 2000.

2. Freescale's policies, practices and channels of distribution of the accused products, including the identity of all distributors of each accused product.

3. The identity of all third parties for whom Freescale, at least partially, made, designed, fabricated, manufactured, implemented or assembled any accused product since January 1, 2000.

4. The location and nature of Freescale documents and databases containing sales, distribution and/or financial information about any accused product, including the terms used and information contained in such documents and databases that relate to sales, revenues, costs and/or profits, including but not limited to the identification of each "field" available in the documents and databases Freescale maintains to track sales of its products.

5. The location and nature of Freescale documents and databases containing transaction-by-transaction or customer-by-customer sales information, including but not limited to the identification of each "field" available in such documents and databases.

6. The Excel spreadsheet containing sales data that was provided by counsel for Freescale to counsel for ProMOS on June 4, 2007, and any correlations of accused products to products listed in the spreadsheet, including but not limited to the identification of any part number decoder or other mechanism that identifies or explains such correlations.

7. Spreadsheets produced by Freescale in discovery purporting to set forth information regarding sales of products accused of infringing the Chan and Fortin patents, including but not limited to the spreadsheets produced in the range FSI DEL 109510-111252.

8. An identification and description of the fabrication facility or facilities in which each of the products identified in the spreadsheets produced by Freescale in discovery and labeled with bates numbers FSI DEL 109510-111252 was manufactured.

9. An identification and description of the facility or facilities in which each of the products identified in the spreadsheets produced by Freescale in discovery and labeled with bates numbers FSI DEL 109510-111252 was assembled and tested.

10. An identification and description of the warehouse or warehouses in which inventory of each of the products identified in the spreadsheets produced in the range FSI DEL 109510-111252 was stored.

11. Freescale's policies and practices with respect to sales agreements between Freescale and its customers, including the terms and conditions of such agreements.

12. Documents relating to Freescale's marketing of each accused product.

13. Communications within Freescale, and between Freescale and any third party, regarding the actual, intended, or possible use, shipment and distribution in the United States of each accused product (including products that incorporate an accused product), including without limitation qualifying each accused product for use in the United States.

14. The name of the process flow or "technology" (e.g., HiP7A) used in each of Freescale's fabrication facilities from January 1, 2004 to the present.

15. The name of the process flow or "technology" used in each of Freescale's fabrication facilities from January 1, 2000 to December 1, 2003.

16. For each Freescale fabrication facility, documents correlating product or part names to particular process flows or “technologies.”

17. The types and locations of documents relevant to each of the foregoing topics.